

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS**

AMERICAN ASSOCIATIONS OF  
UNIVERSITY PROFESSORS, ET AL.,

*Plaintiffs,*

v.

MARCO RUBIO, in his official capacity as  
Secretary of State, and the DEPARTMENT OF  
STATE, ET AL.,

*Defendants.*

No. 1:25-cv-10685-WGY

**JOINT MOTION TO ENTER STIPULATION AND PROPOSED ORDER**

On behalf of the parties, Defendants respectfully submit the attached Stipulated Clawback Agreement and Federal Rule of Evidence 502(d) Proposed Order. The parties have conferred and have stipulated to procedures applicable to a claim of privilege on a produced document. Accordingly, the parties jointly respectfully request that the Court so-order the attached Stipulation and Proposed Order.

DATED: June 11, 2025

Respectfully Submitted,

BRETT A. SCHUMATE  
Assistant Attorney General

WILLIAM KANELIS

YAAKOV M. ROTH  
Principal Deputy Assistant Attorney General

/s/ Ethan B. Kanter  
ETHAN B. KANTER  
Chief, National Security Unit  
Office of Immigration Litigation  
P.O. Box 878, Ben Franklin Station  
Washington, D.C. 20001

DREW C. ENSIGN  
Deputy Assistant Attorney General

LEAH B. FOLEY  
United States Attorney

SHAWNA YEN  
Assistant United States Attorney  
District of Massachusetts

Counsel for Defendants

**CERTIFICATE OF SERVICE**

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing.

/s/ Ethan B. Kanter  
ETHAN B. KANTER  
Chief, National Security Unit  
Office of Immigration Litigation  
P.O. Box 878, Ben Franklin Station  
Washington, D.C. 20001

DATED: June 11, 2025